

Teitelbaum Law Group, LLC
Attorneys for Tri-State III LLC
1 Barker Avenue, 3rd Floor
White Plains, New York 10601
Tel: (914) 437-7670
Email: jteitelbaum@tblawllp.com
Jay Teitelbaum, Esq.

Hearing Date: March 29, 2019
at 10:00 a.m.
Objection Deadline: March 22, 2019
at 5:00 p.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____X

In re:

Chapter 7

CAREN LITKOWSKI,

Case No. 19-22587 (RDD)

Debtor.

_____X

**NOTICE OF HEARING OF TRI-STATE III LLC'S MOTION PURSUANT TO 11 U.S.C.
§§ 105 and 362(d)(1), (d)(2), and (d)(4)(B) and BANKRUPTCY RULE 4001 FOR THE
ENTRY OF AN ORDER (a) MODIFYING THE AUTOMATIC STAY AND ALLOWING
TRI-STATE III TO (i) FILE A MOTION SEEKING THE EXTENSION OF THE
NOTICE OF PENDENCY and (ii) PROCEED WITH THE FORECLOSURE SALE OF
196 GRANDVIEW AVENUE, MONSEY, NEW YORK and (b) GRANTING *IN REM*
RELIEF**

PLEASE TAKE NOTICE that on March 29, 2019, at 10:00 a.m., a hearing will be held before the Honorable Robert D. Drain in Courtroom 118, United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, on the following motion that was filed by Tri-State III LLC, (the "Movant") and any objections filed thereto: Tri-State III LLC's Motion Pursuant to 11 U.S.C. §§ 105 and 362(d)(1), (d)(2) and (d)(4) and Bankruptcy Rule 4001 for the Entry of an Order (a) Modifying the Automatic Stay And Allowing Tri-State III to (i) File a Motion Seeking the Extension of the Notice of Pendency and (ii) Proceed with the Foreclosure Sale of 196 Grandview Avenue, Monsey, New York; and (b) Granting *In Rem* Relief, which documents have

been filed as ECF Doc. Nos. 13 through 13-33, and which were previously filed as ECF Doc. Nos. 6-2 through 6-35.

Dated: March 14, 2019

TEITELBAUM LAW GROUP, LLC
Attorneys for Tri-State III LLC

By: /s Jay Teitelbaum
Jay Teitelbaum, Esq.
1 Barker Avenue, Third Floor
White Plains, New York 10601
Tel: (914) 437-7670
Email: jteitelbaum@tblawllp.com

TO:

Linda M. Tirelli
Tirelli Law Group, LLC
50 Main Street, Suite 1265
White Plains, NY 10606
ltirelli@tw-lawgroup.com

Caren Litkowski
196 Grandview Avenue
Monsey, New York 10952

Mark S. Tulis
Chapter 7 Trustee
Tulis Wilkes Huff & Geiger LLP
220 White Plains Road, 2nd Floor
Tarrytown, New York 10591

United States Trustee
Attn: Maria Catapano
Office of the United States Trustee
U.S. Federal Office Building
201 Varick Street, Room 1006
New York, NY 10014